

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**STATUS UPDATE, STIPULATION,
AND [PROPOSED ORDER]
REGARDING PLAINTIFFS' AND
YOUTUBE'S DMCS RIPE DISPUTES
ISSUES 2 AND 3**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 Defendants YouTube, LLC and Google, LLC (together, “Defendants”), and PI/SD
 2 Plaintiffs (collectively, the “Parties”), respectfully submit this update and stipulation to the Court:

3 WHEREAS, a Discovery Case Management Conference is scheduled before this Court on
 4 October 24, 2024.

5 WHEREAS, on October 18, 2024, the Parties filed a Discovery Case Management
 6 Statement, providing the Court with discovery updates, including ripe discovery disputes. With
 7 respect to Defendants YouTube and Google, the Parties raised, among other things, Ripe Dispute
 8 No. 2 [*YouTube’s Amended Responses or Confirmation in Writing of Agreements Reached by*
 9 *Parties*], and Ripe Dispute No. 3 [*YouTube’s Search of Non-Custodial Sources Identified by PI/SD*
 10 *Plaintiffs*]. The Parties provided their substantive positions on Ripe Dispute No. 2 in the Discovery
 11 Case Management Statement and reported that they intended to file a joint letter brief on Ripe
 12 Dispute No. 3 by October 22, 2024, so that both issues could be considered by the Court at the
 13 October 24, 2024, conference.

14 WHEREAS, the Parties have continued their discussions on both issues and have reached
 15 an agreement that they believe will resolve those issues or inform the scope of any remaining
 16 disputes on those issues.

17 NOW AND THEREFORE, the Parties respectfully request that the Court defer decision
 18 on Ripe Dispute No. 2 so that the Parties can engage in further meet and confers, and that the Court
 19 adopts the following schedule to ensure timely and efficient briefing of this issues:

- 20 a. No later than October 25, 2024, by 5PM PT, Defendants will provide to Plaintiffs,
 in writing, agreed upon information regarding its search of non-custodial sources;
- 21 b. No later than October 29, 2024, the Parties will hold a meet and confer on Ripe
 Dispute Nos. 2 and 3;
- 22 c. No later than November 1, 2024, by 5PM PT, Plaintiffs will identify to Defendants,
 in writing, any remaining issues as to Ripe Disputes Nos. 2 and 3;
- 23 d. No Later than November 6, 2024, by 5PM PT, Defendants will provide to Plaintiffs,
 in writing, substantive responses to remaining issues on Ripe Dispute Nos. 2 and 3;

- e. No later than November 8, 2024, the Parties will hold an H(2) on any remaining issues on Ripe Dispute Nos. 2 and 3; and,
 - f. No later than November 15, 2024, the Parties will file joint letter briefs as to any remaining issues on Ripe Dispute Nos. 2 and 3, so that the Court may consider the briefs at the next Discovery Case Management Conference.
 - g. The Parties agree to meet and confer in good faith at Plaintiffs' reasonable request for information regarding YouTube's search and production from non-custodial sources newly identified by Plaintiffs in YouTube's document production that appear likely to contain relevant information or in response to an identified deficiency. Plaintiffs agree that they will be reasonable and judicious in making any such requests.

IT IS SO STIPULATED AND AGREED,

DATED: October 22, 2024

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

By: /s/ Lauren Gallo White
Lauren Gallo White (State Bar No. 309075)
Samantha A. Machock (State Bar No. 298852)
WILSON SONSINI GOODRICH & ROSATI PC
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

Brian M. Willen (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI PC
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Christopher Chiou (State Bar No. 233587)
Matthew K. Donohue (State Bar No. 302144)
WILSON SONSINI GOODRICH & ROSATI PC
953 East Third Street, Suite 100

Los Angeles, CA 90013
Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
Email: mdonohue@wsgr.com

Attorneys for Defendants YouTube, LLC and Google LLC

DATED: October 22, 2024

By: /s/ Lexi J. Hazam
LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

**JOSEPH G. VANZANDT
BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.
234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com**

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

**MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER**
821 Second Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

**ALEXANDRA WALSH
WALSH LAW**
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

**MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP**
510 Walnut Street Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

1 RON AUSTIN
 2 **RON AUSTIN LAW**
 3 400 MANHATTAN BLVD
 HARVEY, LA 70058
 Telephone: 504-227-8100
 4 raustin@ronaustinlaw.com

5 PAIGE BOLDT
 6 **WATTS GUERRA LLP**
 7 4 Dominion Drive, Bldg. 3, Suite 100
 San Antonio, TX 78257
 Telephone: 210-448-0500
 PBoldt@WattsGuerra.com

8 THOMAS P. CARTMELL
 9 **WAGSTAFF & CARTMELL LLP**
 10 4740 Grand Avenue, Suite 300
 Kansas City, MO 64112
 Telephone: 816-701 1100
 11 tcartmell@wcllp.com

12 SARAH EMERY
 13 **HENDY JOHNSON VAUGHN EMERY, PSC**
 14 2380 Grandview Drive
 Ft. Mitchell, KY 41017
 Telephone: 888-606-5297
 semery@justicestartshere.com

15 CARRIE GOLDBERG
 16 **C.A. GOLDBERG, PLLC**
 17 16 Court St.
 Brooklyn, NY 11241
 Telephone: (646) 666-8908
 18 carrie@cagoldberglaw.com

19 RONALD E. JOHNSON, JR.
 20 **HENDY JOHNSON VAUGHN EMERY, PSC**
 21 600 West Main Street, Suite 100
 Louisville, KY 40202
 Telephone: 859-578-4444
 rjohnson@justicestartshere.com

22 SIN-TING MARY LIU
 23 **AYLSTOCK WITKIN KREIS &**
 24 **OVERHOLTZ, PLLC**
 25 17 East Main Street, Suite 200
 Pensacola, FL 32502
 Telephone: 510-698-9566
 mliu@awkolaw.com

26 JAMES MARSH
 27 **MARSH LAW FIRM PLLC**
 28 31 Hudson Yards, 11th floor
 New York, NY 10001-2170
 Telephone: 212-372-3030
 jamesmarsh@marshlaw.com

1
2 HILLARY NAPPI
3 **HACH & ROSE LLP**
4 112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

5 EMMIE PAULOS
6 **LEVIN PAPANTONIO RAFFERTY**
7 316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

8
9 RUTH THI RIZKALLA
10 **THE CARLSON LAW FIRM, P.C.**
11 1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

12 ROLAND TELLIS
13 DAVID FERNANDES
14 **BARON & BUDD, P.C.**
15 15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

16
17 MELISSA YEATES
18 JOSEPH E. MELTZER
19 **KESSLER TOPAZ MELTZER & CHECK, LLP**
20 280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com
jmeltzer@ktmc.com

21
22 DIANDRA “FU” DEBROSSE ZIMMERMANN
23 **DICELLO LEVITT**
24 505 20th St North Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellosevitt.com

25 Plaintiffs’ Steering Committee Membership
26
27 *Attorneys for Plaintiffs*

ATTESTATION

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 22, 2024

By: /s/ Lauren Gallo White
Lauren Gallo White

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED:

Hon. Peter H. Kang
United States District Court Magistrate Judge